

National Aeronautics and Space Administration
Kennedy Space Center
Kennedy Space Center, FL 32899



October 3, 2011

Reply to Attn of:

CC-A

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance at the Economic Development
Commission Annual Meeting, October 27, 2011

On October 27, 2011, the Economic Development Commission (EDC) will hold its Annual meeting at the King Center for the Performance Arts, Melbourne, Florida. Approximately 200 guests are expected to attend. These guests include NASA officials, members of academia, local elected officials, and representatives from the aerospace industry, local businesses, county and local non-profit organizations, and the media. At the conclusion of the meeting, the EDC will host a networking dinner. The ticket price to attend this event is \$45 a person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having invited NASA personnel attend. This event will provide an opportunity for reviewing the information on change management and transformation and reviewing what successes have been accomplished over the past year, and looking forward to the project and initiative for the New Year. In addition, attendees will be in a diverse forum conducive to disseminating information on NASA's ongoing and future activities and discussing matters of interest to NASA.

Accordingly, NASA employees whose duties do not substantially affect the sponsor, including those employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge, may accept an invitation for complimentary attendance at the event. NASA employees whose duties may substantially affect any of the sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from the Chief Counsel's Office.


Gerald D. Stubbs
Agency Designee

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